

EXHIBIT 3

**IN THE U.S. DISTRICT COURT FOR MARYLAND,
SOUTHERN DIVISION**

BEYOND SYSTEMS, INC.)

Plaintiff)

v.)

Case No. PJM 08 cv 0921

WORLD AVENUE USA, LLC, et al.)

Defendants)

**DEFENDANT'S RESPONSE TO PLAINTIFF'S FIRST SET OF REQUEST
FOR PRODUCTION OF DOCUMENTS IN SUPPORT OF JURISDICTIONAL
DISCOVERY**

Pursuant to Rule 34 of the Federal Rules of Civil Procedure and Rule 104 (6) of the Local Rules of the United States District Court for the District of Maryland, Defendant WORLD AVENUE HOLDINGS, LLC ("Holdings") hereby provides its objections to Plaintiff Beyond Systems, Inc.'s ("BSI") Request for Production of Documents in Support of Jurisdictional Discovery, as follows:

GENERAL OBJECTIONS

1. Holdings objects to each Request for Production ("Request") to the extent that it may be construed as calling for information subject to any claim of privilege, including, but not limited to, the attorney-client privilege and/or the attorney work product doctrine. Pursuant thereto, Holdings and its counsel hereby claim these privileges and object to any such request on this basis.

in Maryland since January 1, 2004, which shall include the creation, sending, marketing, advertising and customer service of those same e-mails.

RESPONSE TO REQUEST FOR PRODUCTION NO. 8:

Holdings objects to this Request on the grounds that the term "YOU" is overly broad, unduly burdensome and oppressive, and beyond the scope of the limited discovery, permitted by the Court's order dated July 14, 2009, to support BSI's supplemental opposition to Holdings' motion to dismiss for lack of personal jurisdiction. For purpose of responding to this interrogatory request, Holdings understands the terms "YOU" to mean Defendant World Avenue Holdings, LLC. Holdings further objects to producing documents in possession and control of any of its subsidiary absent some predicate showing being laid that there are grounds to subject Holdings to the jurisdiction of the Court, i.e., under the piercing the corporate veil theory. Holdings further objects to his Request on the grounds that it is vague and ambiguous as to the term "directed."

Subject to and without waiving the foregoing objection, Holdings responds. Holdings did not exist before June 1, 2006 and has no predecessor entity. Separate entity within the corporate structure in which Holdings serves as a holding company, THEUSEFUL, LLC, does engage in the sending and receipt of Commercial E-Mail and internet advertising. However, Holdings' business activity is limited to that of a holding company, and, thus, it does not engage in the sending or receipt of Commercial E-mail as defined herein. Holdings will produce a recent redacted copy of its organizational chart.

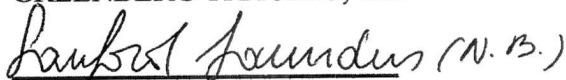
REQUEST FOR PRODUCTION NO. 9:

ALL DOCUMENTS REFERRING or RELATING to PERSONS with whom YOU have entered

receipt of Commercial E-mail as defined herein. Therefore, Holdings has no such documents within its direct possession, custody or control.

Respectfully submitted,
Attorneys for World Avenue Holdings, LLC

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 24 day of August 2009, a copy of the foregoing was served by regular mail, and email, upon the below-named counsel :

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